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8 *Attorneys for Defendants/Counterclaimants*

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 THE PHOENIX INSURANCE COMPANY,
TRAVELERSPROPERTY CASUALTY
12 COMPANY OF AMERICA,

13 Plaintiff.

14 v.

15 YOUR VITAMINS, INC., d/b/a PROCAPS
16 LABORATORIES, and ANDREW LESSMAN,

17 Defendants,

18
19 YOUR VITAMINS, INC., d/b/a PROCAPS
20 LABORATORIES, and ANDREW LESSMAN,

21 Counterclaimants,

22 v.

23 THE PHOENIX INSURANCE COMPANY,
24 TRAVELERSPROPERTY CASUALTY
25 COMPANY OF AMERICA,

26 Counterdefendants.
27
28

No.: 2:12-cv-00564-MMD-RJJ

**DEFENDANTS'/COUNTERCLAIMANTS'
MOTION FOR LEAVE TO FILE UNDER
SEAL A LIMITED NUMBER OF
EXHIBITS SUBMITTED IN
CONNECTION WITH: (1) REPLY TO
TRAVELERS' RESPONSE TO MOTION
TO COMPEL AND (2) REPLY TO
TRAVELERS' RESPONSE TO
COUNTERMOTION FOR SUMMARY
JUDGMENT**

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1 Your Vitamins, Inc., d/b/a ProCaps Laboratories, and Andrew Lessman (collectively,
 2 “Defendants”), by and through their attorneys of Santoro Whitmire, hereby file
 3 Defendants’/Counterclaimants’ Motion For Leave to File Under Seal a Limited Number of
 4 Exhibits Submitted in Connection with (1) Reply to Travelers’ Response to Motion to Compel
 5 and (2) Reply to Travelers’ Response to Countermotion for Summary Judgment. In support
 6 thereof, Defendants state as follows:

7 1. On November 30, 2012, Defendants/Counterclaimants filed a redacted version of
 8 Defendants/Counterclaimants’ Reply to Plaintiffs’ Response to Motion to Compel Production of
 9 Documents and Responses to Interrogatories [Dkt. 62].

10 2. On November 30, 2012, Defendants/Counterclaimants filed a redacted version of
 11 Defendants/Counterclaimants’ Reply to Plaintiffs’ Response to Countermotion for Partial
 12 Summary Judgment [Dkt. 63].

13 3. Defendants seek to file under seal a limited number of exhibits to each of the
 14 foregoing filings.

15 4. The redacted materials relate to documents that are sensitive in nature, that may
 16 contain confidential information and which is appropriately protected from disclosure by the
 17 Protective Order in this case.

18 5. This Motion seeks permission to file the un-redacted exhibits to the motions:

- 19 • Exs. C-E to the Reply [Dkt. 62] relating to the Motion to Compel
- 20 • Ex. A to the Reply [Dkt. 63] relating to the Countermotion for Partial
- 21 Summary Judgment

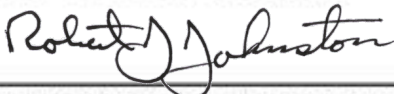
22 Dated this 30th day of November, 2012.

SANTORO WHITMIRE

/s/ James E. Whitmire
 JAMES E. WHITMIRE, ESQ.
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Attorneys for Defendants/Counterclaimants

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: December 3, 2012